

HONORABLE TANA LIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BARONIUS PRESS, LTD., an Isle of Man
limited company,

Plaintiff,

v.

FAITHLIFE CORPORATION, a
Washington corporation,

Defendants.

NO. 2:22-cv-01635-TL

**PLAINTIFF BARONIUS PRESS, LTD.'S
EXHIBIT APPENDIX TO PLAINTIFF'S
SECOND AMENDED VERIFIED
COMPLAINT FOR DAMAGES**

EXHIBIT APPENDIX TO
PLAINTIFF'S SECOND AMENDED VERIFIED COMPLAINT

Exhibit No.	Description of Exhibit
<u>Exhibit 1</u>	Mr. Craig St. Clair's LinkedIn personal profile

EXHIBIT APPENDIX,
CASE NO. 2:22-CV-01635-TL - 1

**GORDON REES SCULLY
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Telephone: (206) 695-5100
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Exhibit No.	Description of Exhibit
<u>Exhibit 2</u>	<p>Documents showing the history of the copyright timeline of <i>Grundriss</i></p> <ul style="list-style-type: none"> • Contract: Ludwig Ott – Herder & co (1951) • Regina Ott – Certificate of Inheritance (1985) • Assignment of Rights: Regina Ott – Seminary of Eichstätt (1985) • Verlag Herder returns the rights to Diocese of Eichstätt (2004) • Diocese of Eichstätt grants Nova et Vetera the rights for English edition (2008) • Agreement: Baronius Press – nova et vetera (2009) [payment terms redacted, and an unredacted version of this agreement will be produced under the parties’ executed protective order] • Agreement: Baronius Press – nova et vetera (2012) [payment terms redacted, and an unredacted version of this agreement will be produced under the parties’ executed protective order] • Addendum to Agreement: Baronius Press – nova et vetera (2015) • <i>Grundriss</i> - Form GATT registration (2014) • U.S. Copyright Office Certificate of Registration – <i>Grundriss der katholischen Dogmatik</i> (2014) • Copyright.gov record view - <i>Grundriss</i>
<u>Exhibit 3</u>	<p>Documents showing the history of the copyright timeline of <i>Fundamentals</i></p> <ul style="list-style-type: none"> • Contract: Mercier Press – Verlag Herder (1953) • Mercier Press – Authors/Translators Ledger - Dr. Patrick Lynch • Mercier Press - Assignment of rights to Baronius Press (2010) [payment terms redacted, and an unredacted version of this assignment will be produced under the parties’ executed protective order] • <i>Fundamentals</i> - Form GATT registration (2014) • U.S. Copyright Office Certificate of Registration – <i>Fundamentals of Catholic Dogma</i> (2014) • Copyright.gov record view - <i>Fundamentals</i>

Exhibit No.	Description of Exhibit
<u>Exhibit 4</u>	Printout of Defendant's Forums: "Ludwig Ott's Fundamentals of Catholic Dogma is Back!" at https://community.logos.com/forums/t/180933.aspx
<u>Exhibit 5</u>	A sample of Plaintiff's press release and coverage regarding an out of court settlement on <i>Fundamentals</i> with St. Benedict Press.
<u>Exhibit 6</u>	Correspondence with Faithlife – Craig St Clair and Bethany Olsen
<u>Exhibit 7</u>	Correspondence Faithlife – Bob Pritchett, President/CEO
<u>Exhibit 8</u>	Copyright Management Information (CMI) in Defendant's copies of public domain titles.
<u>Exhibit 9</u>	A side-by-side comparison of Plaintiff's CMI and Defendant's CMI
<u>Exhibit 10</u>	Printout of Defendant's Forums: "Knox Bible please!" at https://community.logos.com/forums/t/97884.aspx
<u>Exhibit 11</u>	Printout of Defendant's Forums: "Book Suggestion: Knox Bible" at https://community.logos.com/forums/t/181544.aspx
<u>Exhibit 12</u>	Printout of Defendant's Forums: "The Knox Bible – Book Suggestions for Logos" at https://suggestbooks.uservoice.com/forums/308269-book-suggestions/suggestions/10852821-the-knox-bible
<u>Exhibit 13</u>	Printout of Defendant's Forums: "Suggestion: Catholic Bibles" at https://community.logos.com/forums/p/185648/1071879.aspx
<u>Exhibit 14</u>	Printout of Defendant's Forums: "Divine Intimacy – Book Suggestions for Logos" at https://suggestbooks.uservoice.com/forums/308269-book-suggestions/suggestions/11225271-divine-intimacy

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2 Dated: April 10, 2023

GORDON REES SCULLY MANSUKHANI,
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CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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